

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Dennis J. Solomon,	)	Civil Action No. 04-12499 WGY
	)	
Plaintiff,	)	
	)	
	)	
Charles Vest	)	
<i>et al.</i> ,	)	
Defendants	)	
_____	)	

**STATEMENT OF THE DEFENDANT UNIVERSITY OF SOUTHERN  
CALIFORNIA PURSUANT TO LOCAL RULE 7.1(A)(2)**

Undersigned counsel for defendant University of Southern California ("USC") met and conferred with plaintiff Dennis Solomon regarding USC's Motion to Dismiss on March 3, 2005. Counsel for USC informed Mr. Solomon that USC does not believe that it is subject to personal jurisdiction in Massachusetts and that USC plans to file a motion to dismiss unless Mr. Solomon would agree to dismiss USC. Mr. Solomon indicated that he believes that USC is subject to personal jurisdiction in Massachusetts and that he intends to oppose USC's motion.

Respectfully Submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA

*By its attorneys,*

MORISI & OATWAY, P.C.

DATED: \_\_\_\_\_

/s/ Amanda P. O'Reilly

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(\*pro hac vice applications pending)

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the plaintiff by US Mail on the date set forth below.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Amanda P. O'Reilly

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